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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO RE-FILE UNDER SEAL
PORTIONS OF THEIR OPPOSITION
AND SUR-REPLY TO PLAINTIFF
WAYMO LLC'S MOTION FOR
PRELIMINARY INJUNCTION, AND
SUPPORTING DECLARATIONS
THERE TO**

Trial Date: October 2, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to Re-File Under Seal Portions of Their
6 Opposition and Sur-Reply to Plaintiff Waymo LLC's Motion For Preliminary Injunction, and
7 Supporting Declarations Thereto.

8 2. Some of the highlighted portions of Defendants' Opposition to Plaintiff's Motion
9 for Preliminary Injunction ("Opposition"), the Declarations of Michael Lebby ("Lebby
10 Declaration"), Paul McManamon ("McManamon Declaration"), James Haslim ("Haslim
11 Declaration"), and Scott Boehmke ("Boehmke Declaration"), as well as Defendants' Sur-Reply to
12 Plaintiff's Motion for Preliminary Injunction ("Sur-Reply"), Supplemental Declarations of
13 Michael Lebby ("Lebby Supplemental"), Scott Boehmke ("Boehmke Supplemental"), and James
14 Haslim ("Haslim Supplemental") discuss Uber's proprietary and highly confidential designs for
15 Uber's custom LiDAR system or Uber's detailed market strategy information. These portions are
16 highlighted in blue.

17 3. I understand that this proprietary technical and market strategy information is
18 maintained as confidential by Uber and are valuable to Uber's business. The public disclosure of
19 this information would give Uber's competitors access to in-depth descriptions and analysis of
20 Uber's custom LiDAR design or detailed market strategy information. If such information were
21 made public, I understand Uber's competitive standing could be significantly harmed.

22 4. Some of the highlighted portions of the Opposition, Lebby Declaration,
23 McManamon Declaration, Sur-Reply, the Lebby Supplemental, the Haslim Supplemental, Exhibit
24 2 to the Lebby Supplemental, and Exhibit 15 to the Chang Declaration in Support of Defendants'
25 Sur-reply have been designated by Waymo as either confidential or highly confidential.
26 Waymo's designations are highlighted in green in the unredacted copies of the declarations and
27 exhibits.
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